

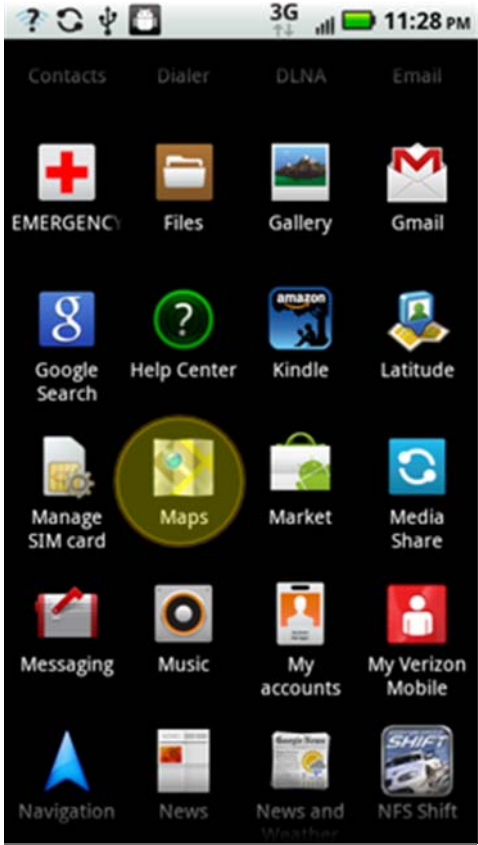
EXHIBIT R


EXHIBIT A**INFRINGEMENT CLAIM CHART****U.S. PATENT NO. 6,339,780**

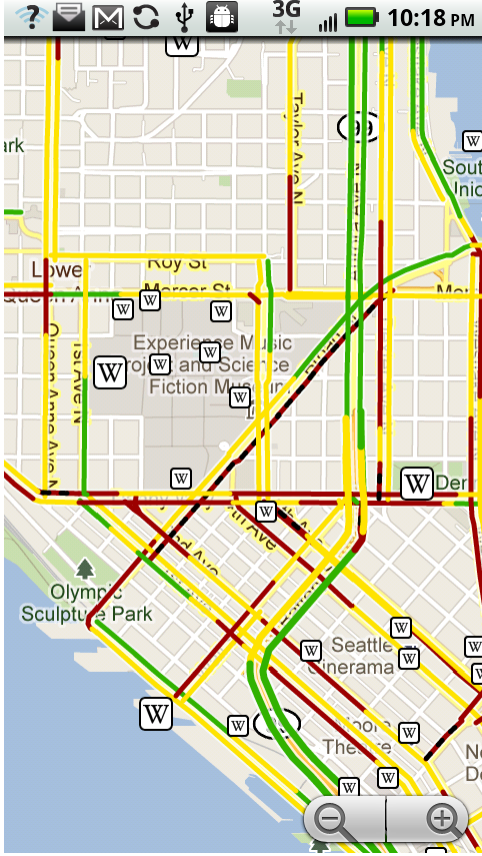
‘780 Patent	Exemplary Motorola Device
<p>1[a]. A hypermedia browser embodied on a computer-readable medium for execution on an information processing device having a limited display area,</p>	<p>Motorola directly infringes this and the following related “hypermedia browser” claims under 35 U.S.C. § 271(a) at least by making, using, selling, and offering for sale in the United States and by importing into the United States the Accused Motorola Devices, each of which contains the infringing “hypermedia browser” (as explained below). For instance, Motorola uses the infringing “hypermedia browser” when testing its smartphone devices in the United States, and Motorola sells and offers for sale the Accused Devices to its carrier partners for subsequent sale to consumers. Also, Motorola imports the Accused Devices into the United States from its foreign manufacturers, distributors and/or other affiliates.</p> <p>Moreover, Motorola indirectly infringes this and the following related “hypermedia browser” claims under 35 U.S.C. § 271(b) at least by actively inducing consumers of Motorola’s smartphone devices to use the “hypermedia browser” in a manner that infringes this claim. For instance, with each Accused Motorola Device, Motorola provides a User Guide or some similar instruction manual which instructs the consumer how to use the Google Maps application included on the device in a manner that infringes this claim. See, e.g., Ex. 780-K, Droid2 User Guide pgs. 39-42, http://www.motorola.com/staticfiles/Support/US-EN/Mobile%20Phones/DROID2/US-EN/Documents/Static Files/DROID2 UG US ENG VZW 68014406001a.pdf (last visited Aug. 18, 2011) (Links to User Guides for the other Accused Motorola Devices are contained in Appendix 1-1). As such, the consumer of Motorola’s products is the direct infringer of the “hypermedia browser” claims. Motorola has known about the ‘780 patent at least since the filing date of Microsoft’s Answer in the original matter (W.D. Wisc. No. 3:10-cv-699).</p> <p>Motorola contributorily infringes this claim under 35 U.S.C. § 271 (c) by importing, selling, and/ or offering for sale, within the United States, the Accused Motorola Devices containing software for use in practicing the patented “hypermedia browser” claims as described and</p>

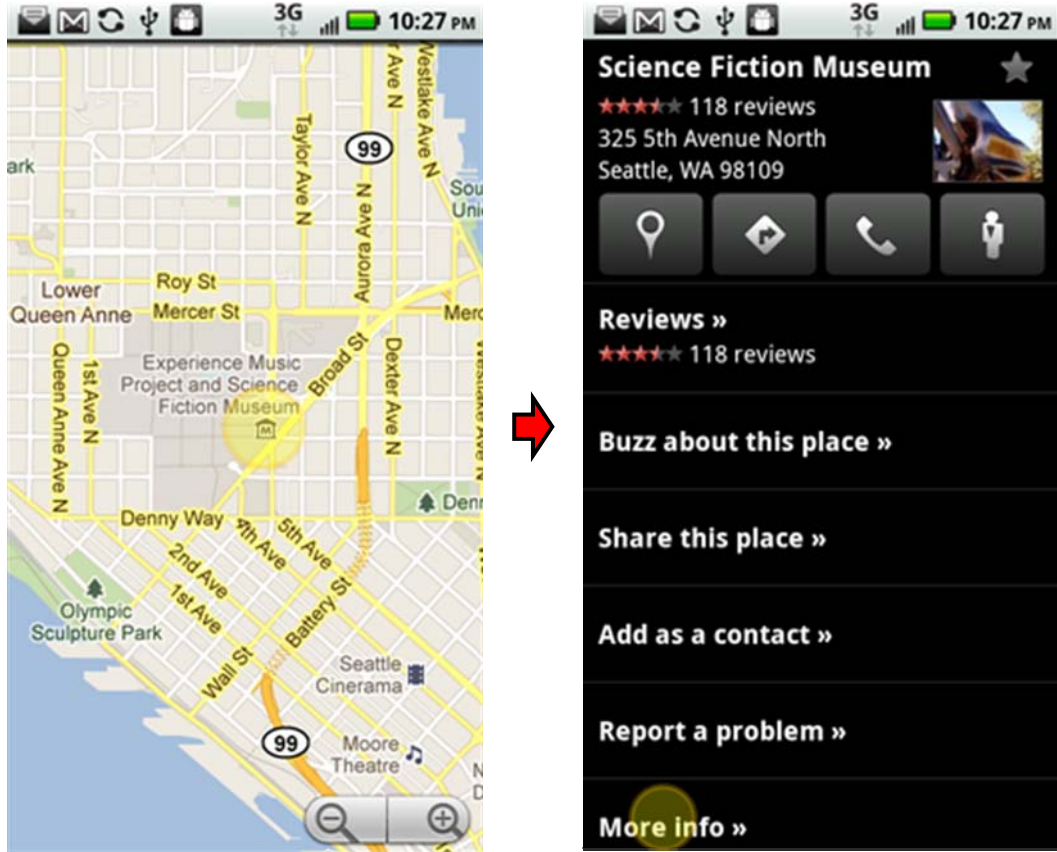
'780 Patent	Exemplary Motorola Device
	<p>distinctly pointed out in these claim charts, such software constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of the '780 patent. The software is not a staple article or commodity of commerce suitable for substantial noninfringing use. For example, at least the software that provides and operates the content viewing area for viewing content which is configured to display a temporary graphic element over the content viewing area during times when the browser is loading content is especially made for use in an infringement of the '780 patent.</p> <p>Each Accused Motorola Device includes a hypermedia browser embodied on a computer-readable medium for execution on an information processing device having a limited display area.</p> <p>For example, Figure 1-1 shows one of the Accused Motorola Devices, the Motorola Droid 2 (hereinafter, "Droid 2").</p> <div data-bbox="1108 850 1472 1198" data-label="Image"> <p>The image shows a Motorola Droid 2 smartphone. The screen displays a social media post from a user named 'Mary Morgan' with a profile picture. The post includes a timestamp '9:20 PM', a status 'Grogginess', and a location 'Kings, Kentucky, 9.15.10 about 433.3 mi'. Below the text is a photo of a person. The phone has a full QWERTY keyboard and various touch-sensitive buttons on the right side of the screen.</p> </div> <p>Figure 1-1 See Appendix 1-1 for similar images of the other Accused Motorola Devices</p> <p>Each Accused Motorola Device is an information processing device, in that they each include a processor, storage, and a display for a graphical user interface. For instance, the Droid 2 has a</p>

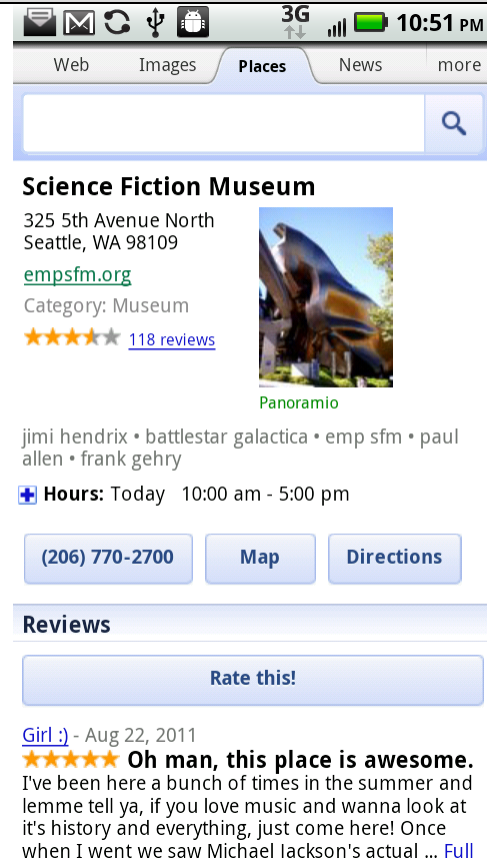
'780 Patent	Exemplary Motorola Device
	<p>1 GHz processor, up to 32 GB of removable microSDHC memory, 8 GB of internal flash “secure storage,” and 512 MB of RAM. See Ex. 780-A, “Droid 2 by Motorola, A955,” http://developer.motorola.com/products/droid2/ (last visited Aug. 18, 2011). Moreover, each Accused Motorola Device has a limited display area. For instance, the Droid 2 has a display comprising merely a 3.7 inch screen (measured diagonally)—much smaller than traditional computer displays. <i>Id.</i> Similar information may be found for each of the Accused Motorola Devices in Appendix 1-1.</p> <p>Each Accused Motorola Device runs the Android operating system, which includes computer-executable instructions and is stored on the internal ROM—a computer readable medium—of each device. This operating system executes a number of applications, including a Maps application. See Ex.780-B, “What is Droid?,” http://developer.android.com/guide/basics/what-is-android.html (visited Aug. 18, 2011). The Maps applications is developed by Google—also the developer of the Android platform—and may also be referred to as Google Maps.</p>

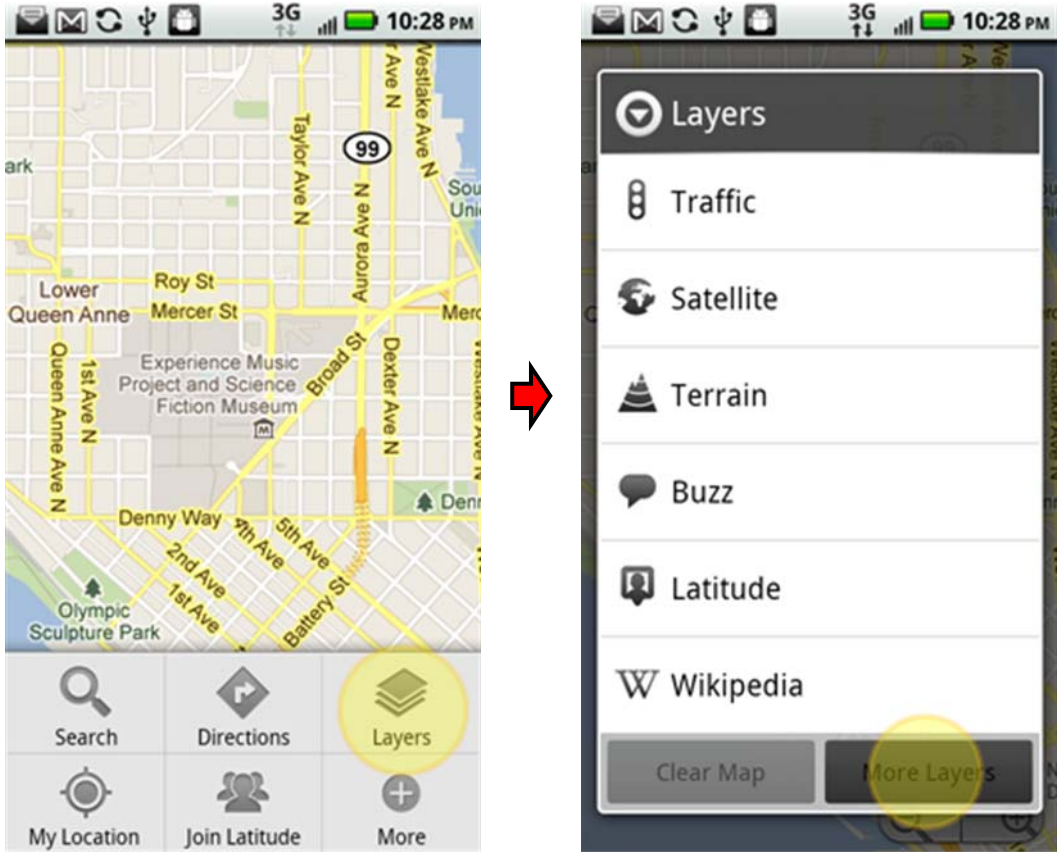
'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1226 1110 1373 1143">Figure 1-2</p> <p data-bbox="688 1208 1898 1419">Google Maps for mobile devices (i.e., Android devices) is a comprehensive location based application that provides various types of geographical information to the user including two dimensional maps, nearby points of interest, place pages, and layers. The place pages provide listing information, pictures, reviews, ratings, and other rich information about a location on the map. The layers are a set of rich information that are overlaid on top of the map, including satellite views, traffic information, terrain topography, and Wikipedia links. See Ex. 780-C,</p>

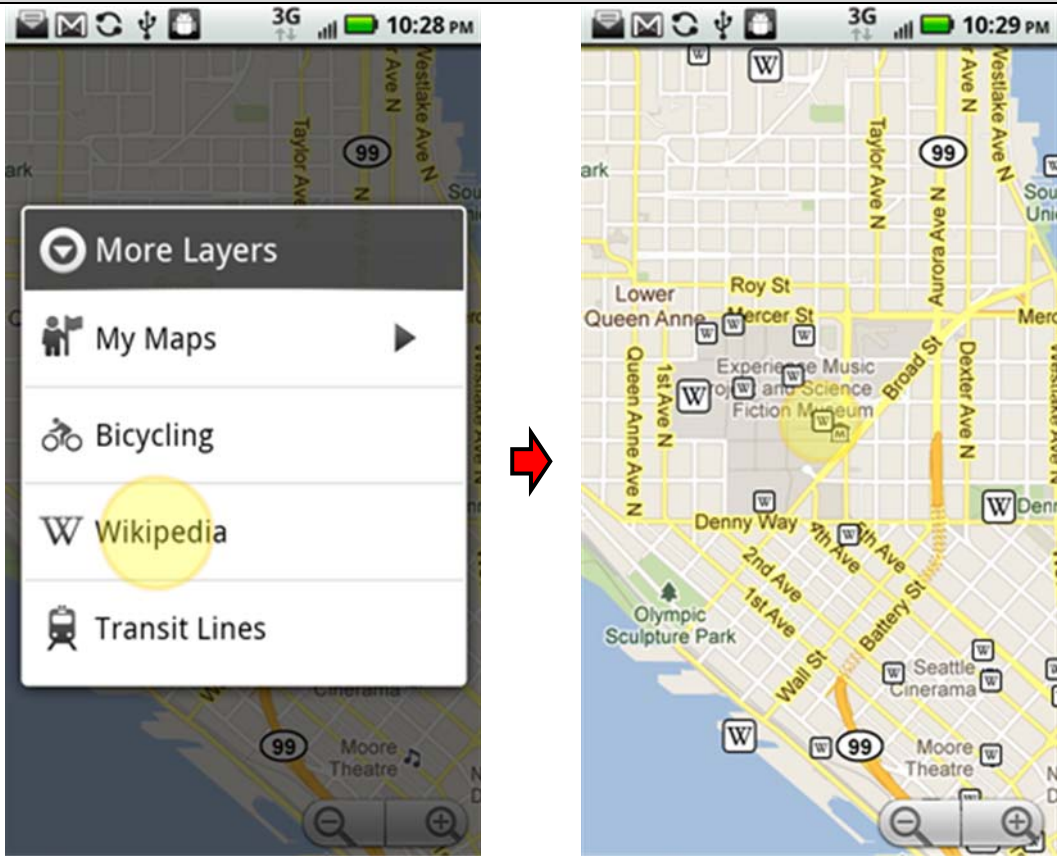
'780 Patent	Exemplary Motorola Device
	<p data-bbox="688 267 1900 300">“Google Maps for mobile,” http://www.google.com/mobile/maps/ (last visited Aug. 18, 2011):</p>  <p data-bbox="1228 1182 1369 1214">Figure 1-3</p> <p data-bbox="688 1242 1900 1356">Google Maps is a hypermedia browser and is capable of displaying or otherwise rendering hypermedia content, such as two dimensional maps, points of interest, and various layers. For example, the following image from the Droid 2 running Google Maps is illustrative:</p>

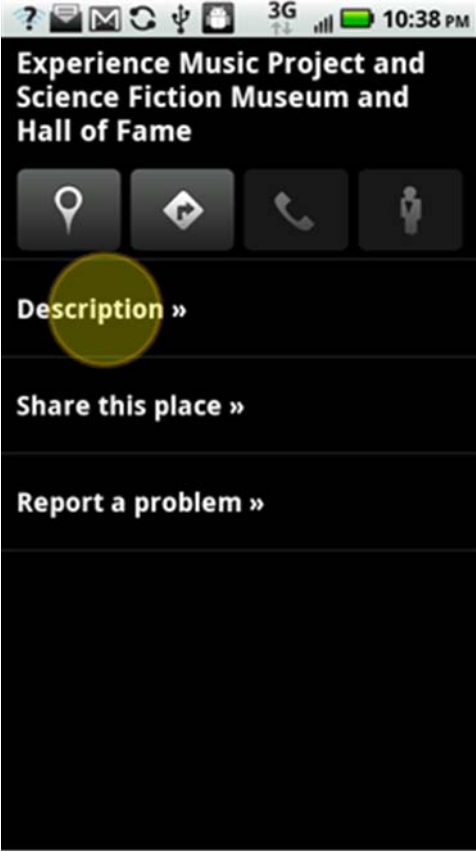

'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1226 1117 1373 1149">Figure 1-4</p> <p data-bbox="785 1154 1814 1187">See Appendix 1-4 for similar images of the other Accused Motorola Devices</p> <p data-bbox="688 1224 1898 1403">Moreover, Google Maps is capable of loading additional or alternative hypermedia content in response to a user's selection of hyperlinks. For instance a user may select certain labeled points of interest, such as an airport or a park, by tapping them on the map. In response, the Google Maps application will retrieve a place page, providing rich information about the point of interest and also providing further hyperlinks which will direct a user to other world wide</p>

'780 Patent	Exemplary Motorola Device
	<p data-bbox="688 267 1885 337">web documents. For example, the following image from the Droid 2 running Google Maps is illustrative:</p> <div data-bbox="772 375 1822 1221">  </div>

'780 Patent	Exemplary Motorola Device
	 <p style="text-align: center;">Figure 1-5</p> <p style="text-align: center;">See Appendix 1-5 for similar images of the other Accused Motorola Devices</p> <p>Alternatively, a user may turn on the Wikipedia layer and thereby select any of the “W” points on the map by tapping them. In response, the Google Maps application will retrieve an information page with a brief excerpt of the related Wikipedia article accompanied by a link to the full article, which will direct the user to the related world wide web document. For example, the following image from the Droid 2 running Google Maps is illustrative:</p>

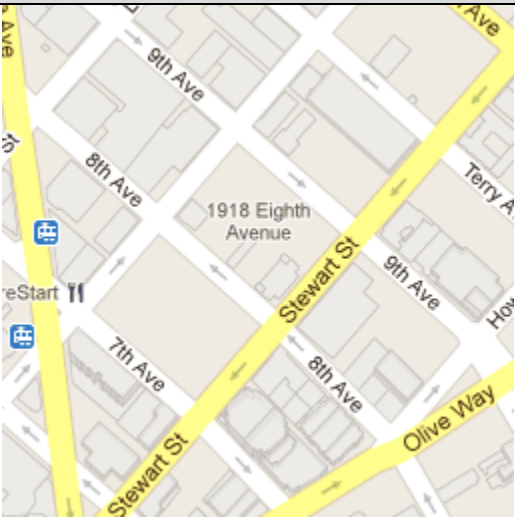
'780 Patent	Exemplary Motorola Device
	 <p>The diagram illustrates the interaction between a '780 Patent' and an 'Exemplary Motorola Device'. The device screen shows a map application with a 'Layers' menu open. The menu lists various map layers: Traffic, Satellite, Terrain, Buzz, Latitude, and Wikipedia. At the bottom of the menu are 'Clear Map' and 'More Layers' buttons. A red arrow points from the 'Layers' button on the map interface to the 'Layers' menu, and another red arrow points from the 'More Layers' button to the 'Layers' menu.</p>

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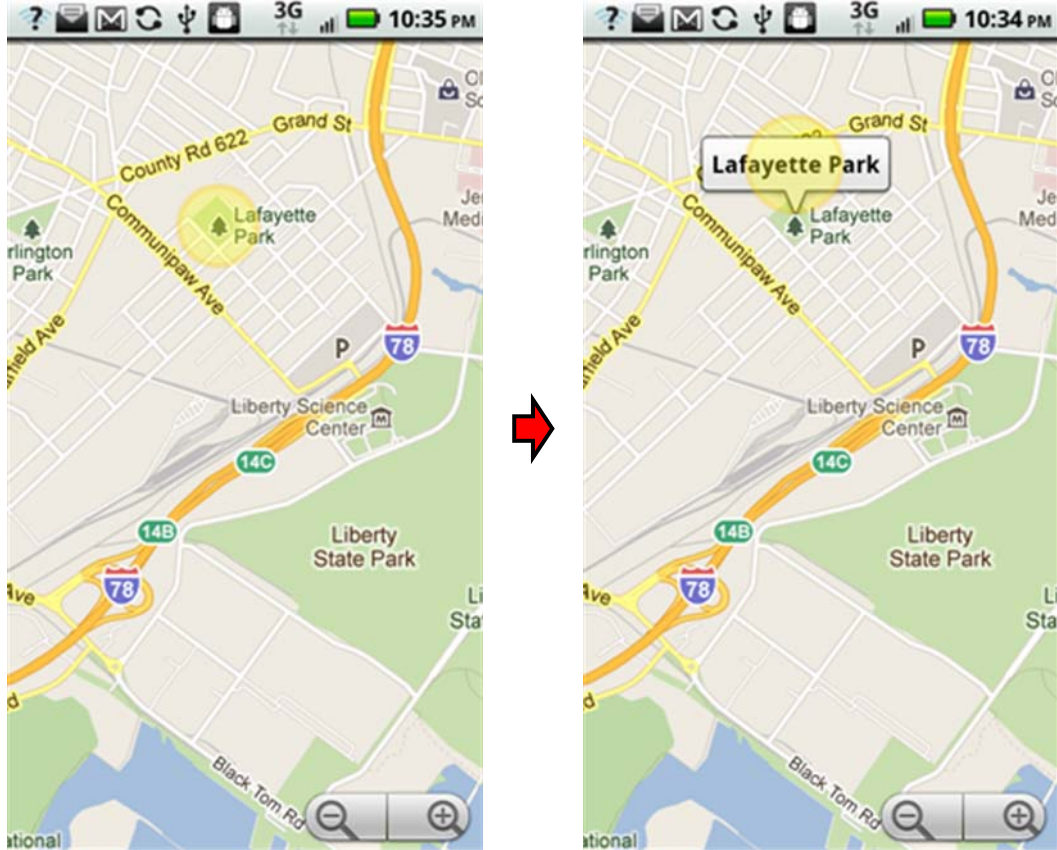
'780 Patent	Exemplary Motorola Device
	 <p>The Experience Music Project and Science Fiction Museum and Hall of Fame (abbreviation rendered with a pipe as EMP SFM) is a museum dedicated to the history and exploration of both popular music and science fiction located in Seattle, Washington. The Frank Gehry-designed museum building is located on the campus of the Seattle Center, adjacent to the Space Needle and the Seattle Center Monorail, which runs through the building. Experience Music Project (EMP) was founded by Microsoft co-founder Paul Allen, and opened its doors in 2000. EMP struggled financially in its early years; as a result, Allen established the Science Fiction Museum and Hall of Fame (SFM), which opened in 2004 in the south wing of the EMP building. When SFM opened, EMP and SFM were treated as separate museums, and visitors had the option of purchasing admission to one museum, or, at a higher cost, a combined admission to both. In 2007, after mounting criticism, EMP SFM ended the separate admissions policy and ...</p> <p>Full article</p> <p><small>All text is available under the terms of the GNU Free Documentation License</small></p> <p> WIKIPEDIA</p> <p>Figure 1-6 See Appendix 1-6 for similar images of the other Accused Motorola Devices</p>
1[b]. wherein the hypermedia browser has a content viewing area for viewing content and is configured to display a temporary graphic	<p>Each Accused Motorola Device includes a hypermedia browser that has a content viewing area for viewing content and is configured to display a temporary graphic element over the content viewing area during times when the browser is loading content.</p> <p>As explained for Claim 1[a], the Google Maps application is a hypermedia browser. When</p>

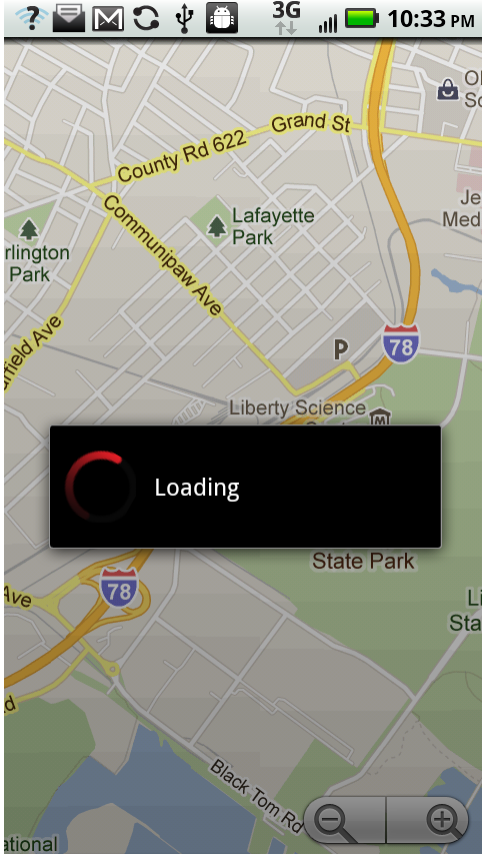
‘780 Patent	Exemplary Motorola Device
<p>element over the content viewing area during times when the browser is loading content,</p>	<p>viewing a map, Google Maps generally splits the screen into two portions, a tool bar at the top and a map viewing area covering the remainder of the screen. The tool bar conceals and does not allow direct interaction with the map in the viewing area. The map viewing area is a content viewing area. The map viewing area displays the relevant content of the program: the map, points of interest, graphical route information, and any other layers superimposed on the map. Notice, when the application displays a place page or a Wikipedia page, the search bar disappears, and the content viewing area encompasses the entire screen. See Figures 1-5 and 1-6, <i>supra</i>.</p> <p>As defined in this Claim—see Claim 1[d], below—content comprises data for presentation which is from a source external to the browser. The maps, points of interests or other layers superimposed on the map are all data for presentation. All of this content comes from a source external to the Google Maps application. Indeed, this content is downloaded from a remote server. For instance, the map elements are split up into an absolutely positioned grid (relative to its place on the planet). See Ex. 780-D, “Google Maps Javascript API V3 Map Types,” http://code.google.com/apis/maps/documentation/javascript/maptypes.html#MapTypes.</p>

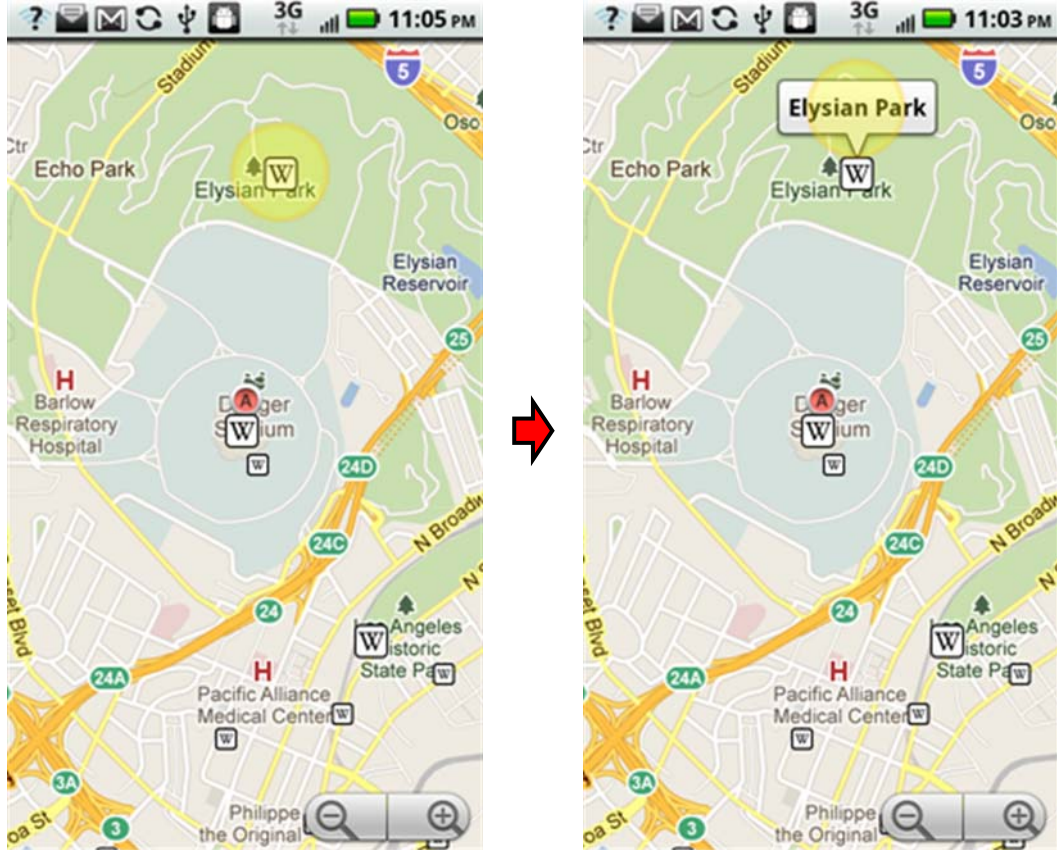
'780 Patent	Exemplary Motorola Device
	<div data-bbox="1045 261 1556 776" data-label="Image"> </div> <p data-bbox="1226 776 1373 813">Figure 1-7</p> <p data-bbox="688 878 1877 948">Each block on the grid is represented by a single image. This image may be accessed from a universal resource locator (URL) that adheres, at its simplest, to the following template:</p> <p data-bbox="688 984 1814 1013"><code>http://mt1.google.com/vt/x=[x index no.]&y=[y index no.]&z=[zoom value]</code></p> <p data-bbox="688 1052 1898 1159">This information is mirrored on various Google servers, labeled <i>mt0</i>, <i>mt1</i>, <i>mt2</i>, and <i>mt3</i>, which are remote to the mobile device. For instance, a tile representing the location of the Seattle courthouse for the Western District of Washington may be found at this URL:</p> <p data-bbox="688 1166 1709 1198">http://mt1.google.com/vt/x=10497&y=22885&z=16, as displayed in Figure 1-8.</p>

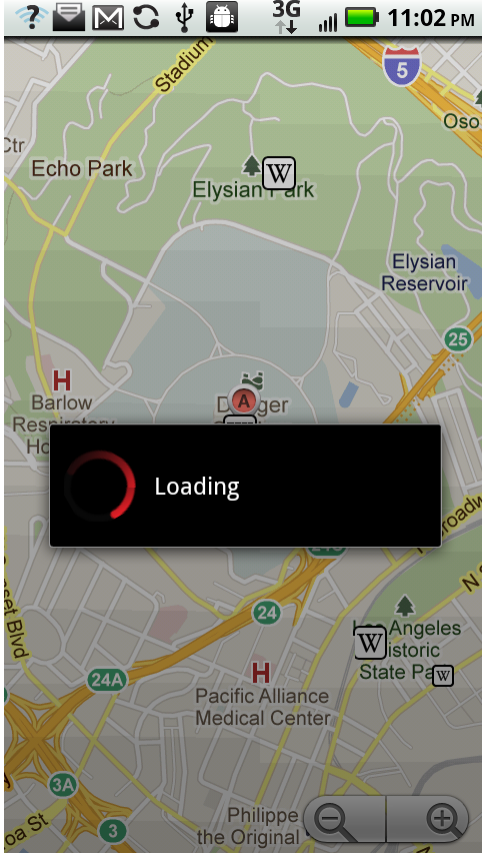
'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1226 776 1373 808">Figure 1-8</p> <p data-bbox="688 841 1906 1203">Moreover, the Google Maps application is heavily reliant on the mobile device's data connection, requiring an active data connection at all times to function. See Ex.780-E, "Data plans: Google Maps app for Android," http://www.google.com/support/mobile/bin/answer.py?hl=en&answer=39890&topic=14256. Because of this, newer versions of the Google Maps application allow for caching and prefetching of map data to improve the user experience. See Ex. 780-F, "Caching and Offline Reliability," http://www.google.com/support/mobile/bin/answer.py?hl=en&answer=1079238&topic=14256. Accordingly, a significant portion of the application's content is from a source external both to the application and the device.</p> <p data-bbox="688 1243 1906 1414">If content has not been previously loaded into the Google Maps application, a temporary graphic element will appear over the content viewing area during the times that the application is loading content. For instance, when a user taps on a point of interest or a "W" on the map, a caption bubble will appear at the point tapped. Further clicking on the caption bubble will direct the application to open a place page or a Wikipedia page. The information contained in</p>

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	<p>the place page or Wikipedia page is content because it is data for presentation that is not native to the Google Maps application itself; instead the application loads this information, much like the map tiles, from a remote server.</p> <p>While the point of interest or Wikipedia information is being loaded in preparation for display as a place page or Wikipedia page, respectively, a small black rectangle, containing an animated circle and the word “Loading,” appears over a portion of the map viewing area for a temporary period of time. Because of these qualities, the black loading rectangle is a temporary graphic element. Figure 1-9 is illustrative of the point of interest approach as performed on the Motorola Droid 2. Figure 1-10 is illustrative of the Wikipedia layer approach, also as performed on the Motorola Droid 2:</p>

'780 Patent	Exemplary Motorola Device
	

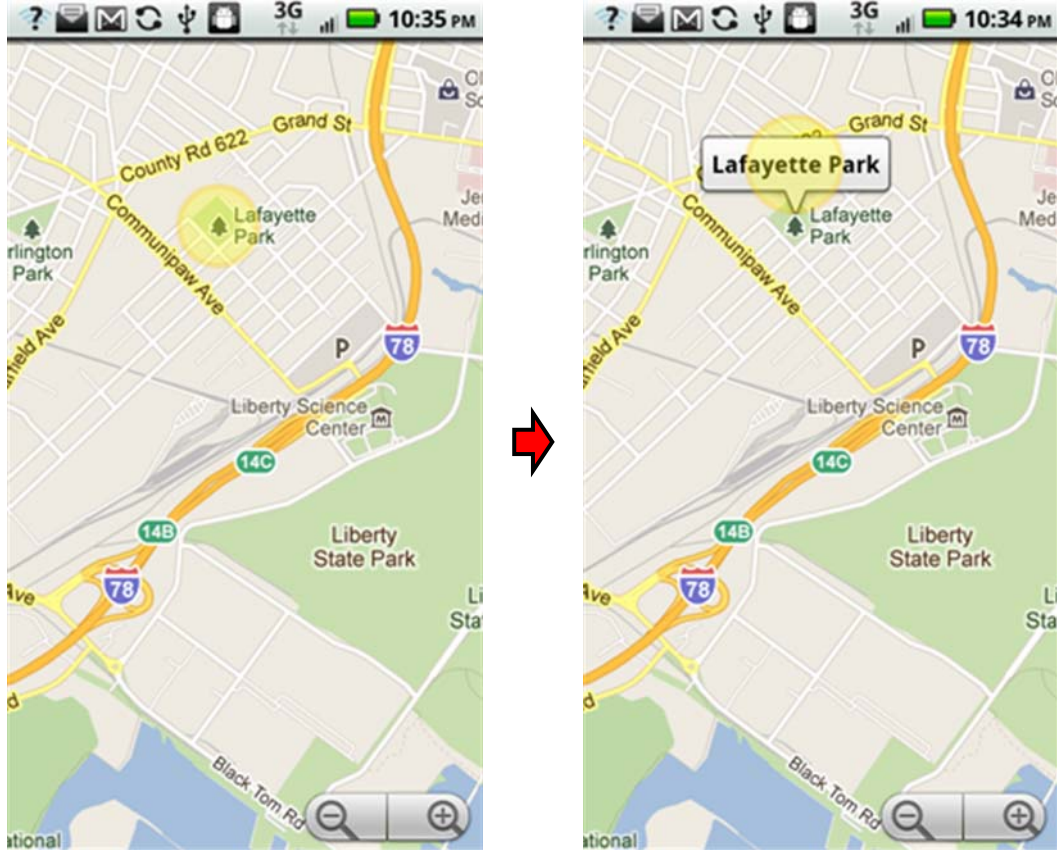
'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1226 1117 1369 1149">Figure 1-9</p> <p data-bbox="785 1153 1810 1185">See Appendix 1-9 for similar images of the other Accused Motorola Devices</p>

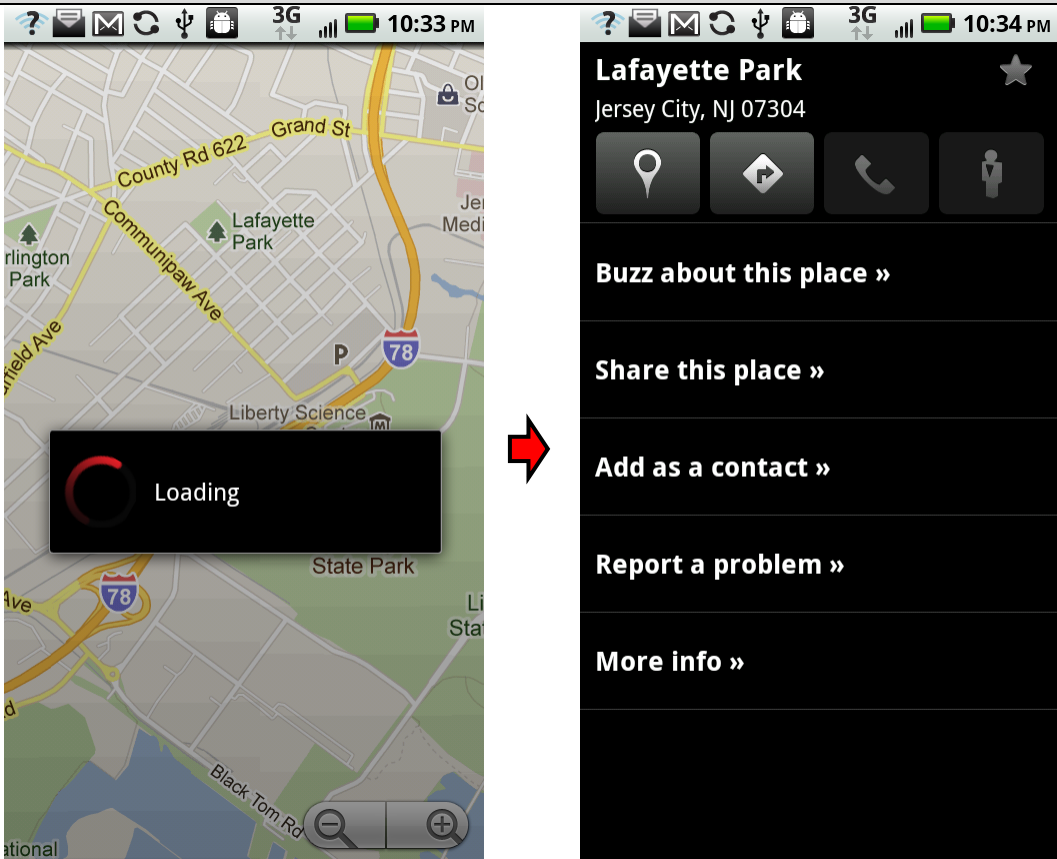
'780 Patent	Exemplary Motorola Device
	

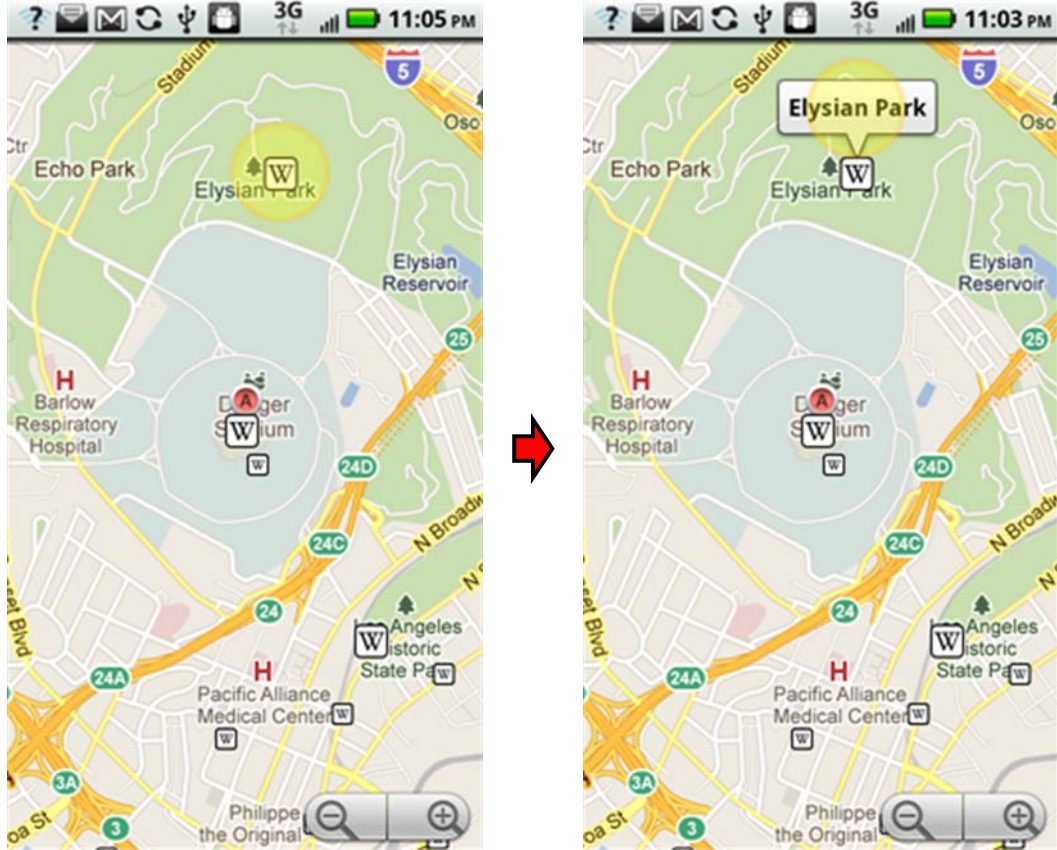
'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1220 1117 1379 1149">Figure 1-10</p> <p data-bbox="779 1154 1820 1187">See Appendix 1-10 for similar images of the other Accused Motorola Devices</p> <p data-bbox="688 1224 1860 1295">When the application is finished loading the content, the black loading rectangle disappears and the place page or Wikipedia page is displayed instead. See Figures 1-5 and 1-6, <i>supra</i>.</p>
1[c]. wherein the temporary graphic element is positioned	Each Accused Motorola Device includes a temporary graphic element that is positioned over the content viewing area to obstruct only part of the content in the content viewing area.

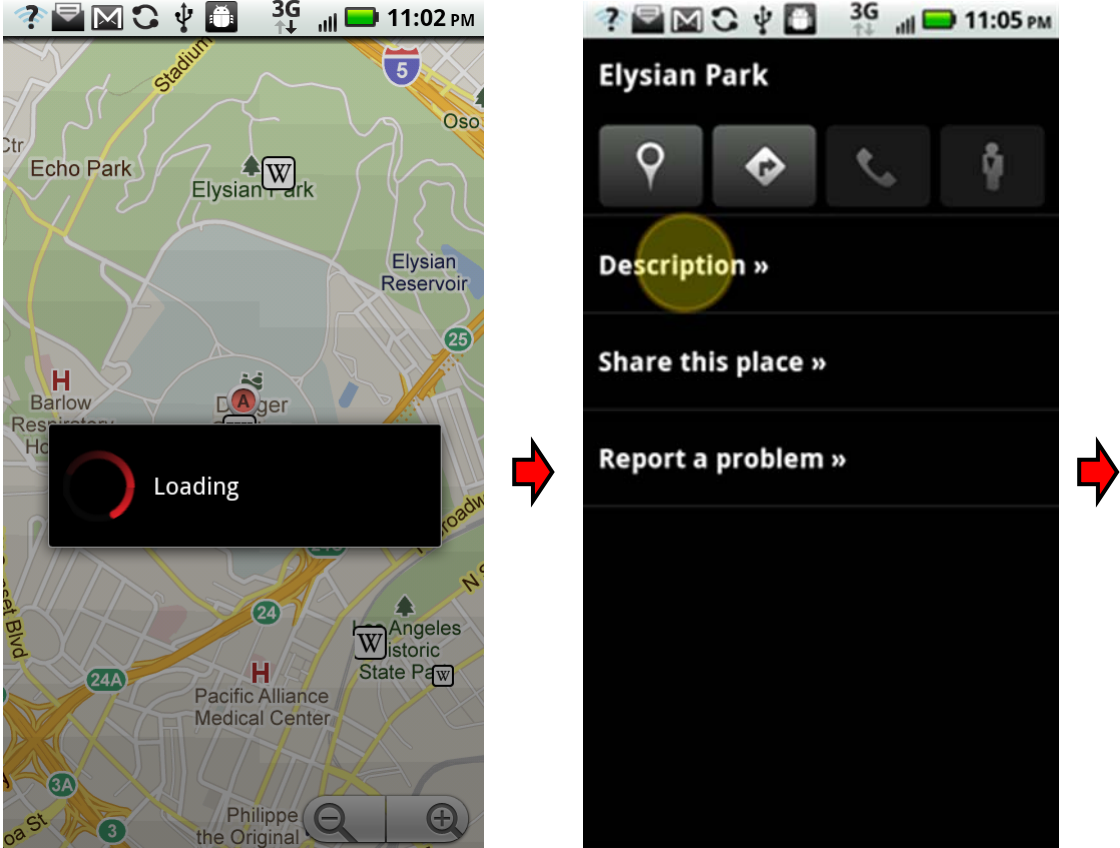
‘780 Patent	Exemplary Motorola Device
<p>over the content viewing area to obstruct only part of the content in the content viewing area,</p>	<p>As described for Claim 1[b], the Google Maps application loads content in reaction to a user’s selection of points of interest or a “W” on the map. While information is being loaded in preparation for display as a place page or Wikipedia page, a small black rectangle, containing an animated circle and the word “Loading,” appears over a portion of the map viewing area for a temporary period of time. The black loading rectangle is a temporary graphic element.</p> <p>The black loading rectangle is positioned over the map viewing area. The black rectangle obstructs only a part of the content in the map viewing area. See supra, Fig. 1-9, 1-10. That is, while the small portion of the map covered by the black loading rectangle is obscured from the user’s view, the remaining portions of the map not covered by the black loading rectangle are still viewable to the user.</p>
<p>1[d]. wherein the temporary graphic element is not content and</p> <p>wherein content comprises data for presentation which is from a source external to the browser.</p>	<p>Each Accused Motorola Device includes a temporary graphic element that is not content.</p> <p>The black loading rectangle is not content. As defined in this Claim, content comprises data for presentation which is from a source external to the browser. The black loading rectangle is rendered by the Google Maps application itself and is not from a source external to the application. The black loading rectangle is not part of the content downloaded from remote servers when displaying the map element, place page, or Wikipedia page information.</p>
<p>2. A hypermedia browser as recited in claim 1, wherein the browser is configured to display the temporary graphic element over the content viewing area only during times when the browser is loading visible content.</p>	<p>The infringement chart for claim 1 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a hypermedia browser that is configured to display the temporary graphic element over the content viewing area only during times when the browser is loading visible content.</p> <p>If content has not been previously loaded into the Google Maps application, a temporary graphic element will appear over the content viewing area during the times that the application is loading content. For instance, when a user taps on a point of interest or a “W” and</p>

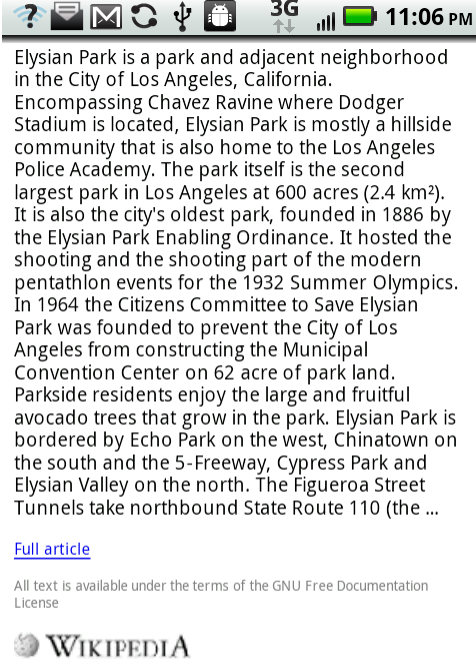

‘780 Patent	Exemplary Motorola Device
	<p>subsequently on its caption bubble on the map, the application will open a place page or a Wikipedia page. While information is being loaded in preparation for display as a place page or Wikipedia page, a small black rectangle, containing an animated circle and the word “Loading,” appears over a portion of the map viewing area for a temporary period of time.</p> <p>This black loading rectangle is a temporary graphic element and is positioned over the map viewing area. The black rectangle obstructs only a part of the content in the map viewing area.</p> <p>The black loading rectangle is displayed over a portion of the map viewing area only during the time when the application is loading visible content. When the application is finished loading the place page or Wikipedia page information, the black loading rectangle disappears and the place page or Wikipedia page is displayed instead. For example, the following images from the Droid 2 running Google Maps are illustrative:</p>

'780 Patent	Exemplary Motorola Device
	

'780 Patent	Exemplary Motorola Device
	 <p data-bbox="1226 1117 1367 1149">Figure 2-1</p> <p data-bbox="785 1153 1812 1185">See Appendix 2-1 for similar images of the other Accused Motorola Devices</p>

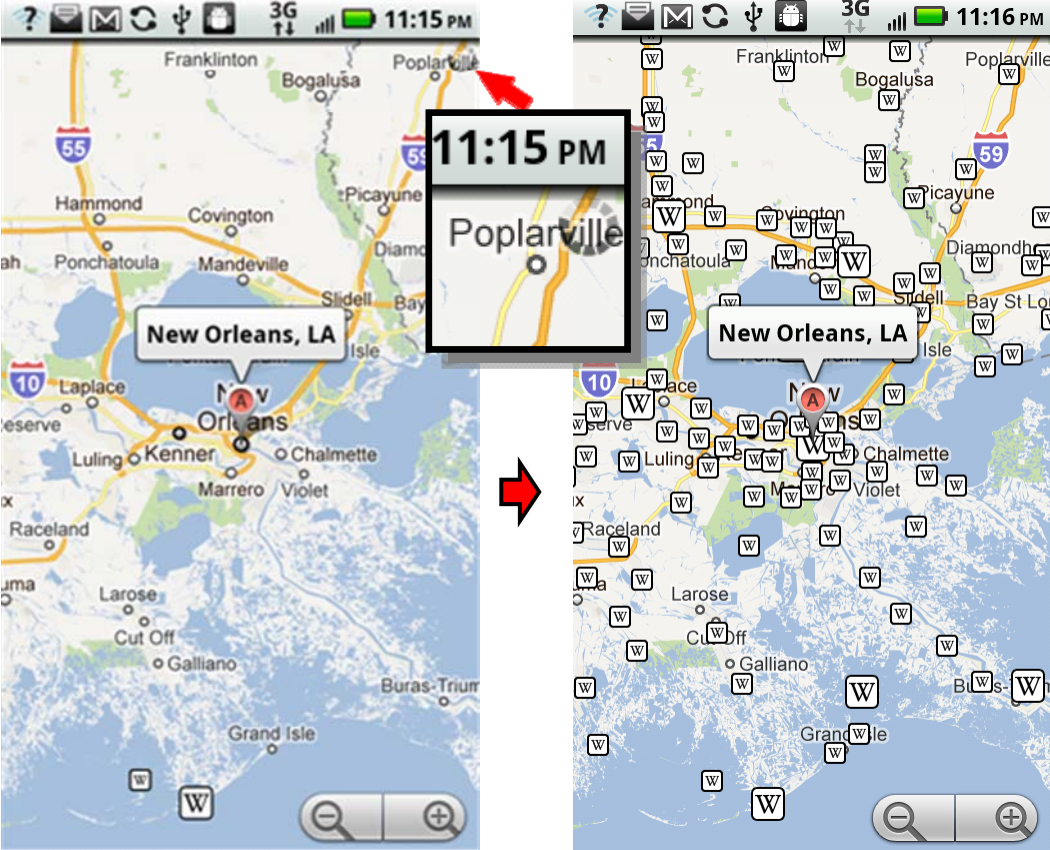
'780 Patent	Exemplary Motorola Device
	

'780 Patent	Exemplary Motorola Device
	

'780 Patent	Exemplary Motorola Device
	 <p>Elysian Park is a park and adjacent neighborhood in the City of Los Angeles, California. Encompassing Chavez Ravine where Dodger Stadium is located, Elysian Park is mostly a hillside community that is also home to the Los Angeles Police Academy. The park itself is the second largest park in Los Angeles at 600 acres (2.4 km²). It is also the city's oldest park, founded in 1886 by the Elysian Park Enabling Ordinance. It hosted the shooting and the shooting part of the modern pentathlon events for the 1932 Summer Olympics. In 1964 the Citizens Committee to Save Elysian Park was founded to prevent the City of Los Angeles from constructing the Municipal Convention Center on 62 acre of park land. Parkside residents enjoy the large and fruitful avocado trees that grow in the park. Elysian Park is bordered by Echo Park on the west, Chinatown on the south and the 5-Freeway, Cypress Park and Elysian Valley on the north. The Figueroa Street Tunnels take northbound State Route 110 (the ...</p> <p>Full article</p> <p>All text is available under the terms of the GNU Free Documentation License</p> <p> WIKIPEDIA</p> <p>Figure 2-2</p> <p>See Appendix 2-1 for similar images of the other Accused Motorola Devices</p> <p>The place page and Wikipedia page are both visible content. As shown in figures 2-1 and 2-2, the place page and Wikipedia page are both visible. Furthermore, as defined in Claim 1[d], content comprises data for presentation which is from a source external to the browser. The place page and Wikipedia page are both data for presentation from a source external to the browser. As explained for Claim 1[b] above, the information contained in the place page or</p>

'780 Patent	Exemplary Motorola Device
	<p>Wikipedia page is downloaded from a remote server and is not native to the Google Maps application itself.</p>
<p>3. A hypermedia browser as recited in claim 1, wherein the temporary graphic element indicates to a user that the browser is loading content.</p>	<p>The infringement chart for claim 1 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a temporary graphic element that indicates to a user that the browser is loading content.</p> <p>As mentioned in Claim 1[b] above, the Google Maps application renders and displays a black loading rectangle during the loading of content. The black loading rectangle contains further graphic elements viewable to a user including an animated circle and the word "Loading." These graphic elements, particularly the text "Loading," indicate to a user that the application is loading content. See, e.g., Figures 1-9, 1-10, <i>supra</i>.</p>
<p>4. A hypermedia browser as recited in claim 1, wherein the temporary graphic element disappears when the browser's loading of content is complete to indicate to a user that such loading of content is complete.</p>	<p>The infringement chart for Claim 1 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a temporary graphic element that disappears when the browser's loading of content is complete to indicate to a user that such loading of content is complete.</p> <p>As described in Claim 2 above and incorporated herein, the black loading rectangle is a temporary graphic element that is displayed over a portion of the map viewing area only during the time when the application is loading content. When the application is finished loading the place page or Wikipedia page information, the black loading rectangle disappears and the place page or Wikipedia page is displayed instead. See. Figures 2-1 and 2-2, <i>supra</i>.</p> <p>As described in Claim 3 above and incorporated herein, the appearance of the black loading rectangle (including the animated circle and "Loading" text) indicates to a user that the application is loading content. Therefore, the subsequent disappearance of the black loading rectangle indicates to a user that such loading of content is complete.</p>

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<p>5. A hypermedia browser as recited in claim 1, wherein the temporary graphic element is animated.</p>	<p>The infringement chart for Claim 1 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a temporary graphic element that is animated.</p> <p>The black loading rectangle is a temporary graphic element comprising an animated circle element. See evidence discussed above in Claim 3.</p>
<p>6. A hypermedia browser as recited in claim 1, wherein the hypermedia browser displays the temporary graphic element in a corner of the content viewing area.</p>	<p>The infringement chart for Claim 1 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a hypermedia browser that displays the temporary graphic element in a corner of the content viewing area.</p> <p>If the Wikipedia layer content has not been previously loaded into the Google Maps application, a temporary graphic element will appear over the content viewing area during the times that the application is loading content. As describe above for Claim 1[a], the Google Maps application can add layers to the map viewing area that can provide information beyond the map’s typical functions. For instance, one of those layers is the Wikipedia layer, described in Figure 1-6, <i>supra</i>. As shown, adding layers to the map requires the display of additional graphical elements. In the case of the Wikipedia layer, the additional graphical elements are the multiple “W” in white boxes overlaid on top multiple points of interest. The information respecting where these layers are placed on the map is content, and—like much of the information used by Google Maps—is received from a source external to the application.</p> <p>While these additional graphic elements are being loaded and displayed on the screen, an animated grey hashed circle appears in the top right corner of the map viewing area. Figure 6 is illustrative. The grey hashed circle appears only over a portion of the map viewing are and is only displayed during the time that the Wikipedia layer information is being loaded on the map appears over a portion of the map viewing area for a temporary period of time. Because of these qualities, the grey hashed circle is a temporary graphic element that indicates a load status of the Google Maps application.</p>

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	 <p data-bbox="1234 1117 1360 1149">Figure 6</p> <p data-bbox="800 1154 1801 1187">See Appendix 6 for similar images of the other Accused Motorola Devices</p> <p data-bbox="688 1226 1902 1401">The grey hashed circle is positioned over the map viewing area. The grey hashed circle obstructs only a part of the visible content in the map viewing area. See Fig. 6, <i>supra</i>. That is, while the small portion of the map covered by the grey hashed circle is obscured from the user's view, the remaining portions of the map not covered by the grey hashed circle are still viewable to the user.</p>

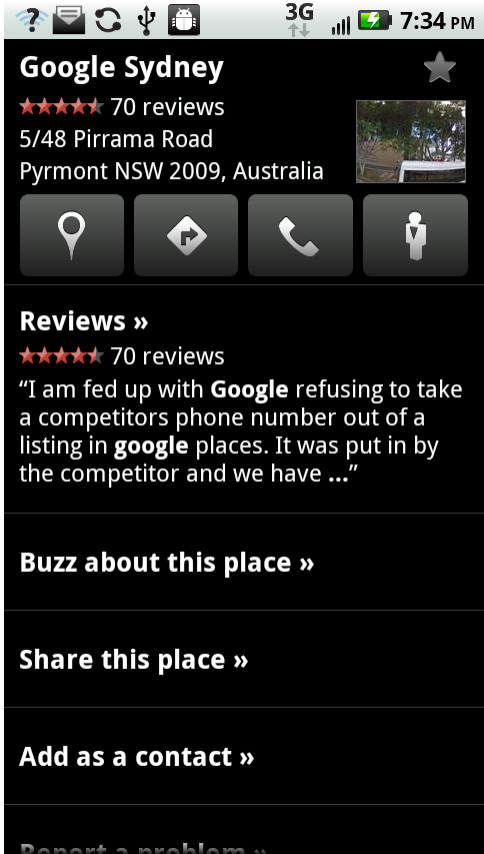
'780 Patent	Exemplary Motorola Device
	<p>Moreover, the grey hashed circle is not content. Like the black loading rectangle described in claim 1[d], the grey hashed circle is similar to other application elements, such as the tool bar and zoom buttons in that the grey hashed circle is rendered by the Google Maps application itself and is not from a source external to the application. The grey hashed circle is not part of the content downloaded from remote servers when displaying the map elements or the Wikipedia layer information. As such, the grey hashed circle is not content.</p> <p>The grey hashed circle is consistently located in the corner of the map viewing area. See Fig. 6, <i>supra</i>.</p>
<p>9. A hypermedia browser as recited in claim 1, wherein the temporary graphic element conveys status information of the browser.</p>	<p>The infringement chart for Claim 1 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes a temporary graphic element that conveys status information of the browser.</p> <p>The Google Maps application renders and displays a black loading rectangle during the loading of content. The black loading rectangle contains further graphic elements viewable to a user including an animated circle and the word "Loading." These graphic elements, particularly the text "Loading," convey status information of the application, including its loading status. See the evidence discussed above in Claim 1[b].</p>
<p>10. A hypermedia browser of claim 1, wherein content is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results</p>	<p>The infringement chart for Claim 1 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes content that is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language.</p> <p>As described for Claim 1[a] above, the Google Maps application produces visual content, including maps, points of interest, various layers, place pages and Wikipedia pages. As described for Claim 1[b] above, this visual content is from a source external to the application.</p>

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of a scripting language.	<p>This various visual content is a visible effect of a markup language, visible text of such a mark up language, and visible results of a scripting language.</p> <p>First, the Google Maps application displays the visible results of a scripting language. The Google Maps Javascript API V3 is an example of how the Google Maps application functions on a mobile device. Indeed, Google’s technical documentation states “[t]he Google Maps API V3 has been designed to load fast and work well on mobile devices. In particular, we have focused on development for advanced mobile devices such as the iPhone and handsets running the Android operating system.” See Ex. 780-G, “Google Maps Javascript API V3 Basics,” http://code.google.com/apis/maps/documentation/javascript/basics.html#Mobile (last visited Aug. 18, 2011).</p> <p>“The JavaScript code for the Maps API is loaded via a bootstrap URL of the form http://maps.googleapis.com/maps/api/js. This bootstrap request loads all of the main Javascript objects and symbols for use in the Maps API” JavaScript is a form of scripting language. For instance, Google’s technical documentation details how the use of javascript elements can result in the display of a visual two dimensional map:</p>

'780 Patent	Exemplary Motorola Device
	<div data-bbox="743 272 1852 313" style="background-color: #e6f2ff; padding: 5px;"> The "Hello, World" of Google Maps v3 </div> <p data-bbox="758 337 1793 399">The easiest way to start learning about the Google Maps API is to see a simple example. The following web page displays a map centered on Sydney, New South Wales, Australia:</p> <div data-bbox="758 423 1852 1321" style="border: 1px solid #ccc; padding: 10px; background-color: #f9f9f9;"> <pre data-bbox="779 448 1814 1305"> <!DOCTYPE html> <html> <head> <meta name="viewport" content="initial-scale=1.0, user-scalable=no" /> <style type="text/css"> html { height: 100% } body { height: 100%; margin: 0; padding: 0 } #map_canvas { height: 100% } </style> <script type="text/javascript" src="http://maps.googleapis.com/maps/api/js?sensor=set_to_true_or_false"> </script> <script type="text/javascript"> function initialize() { var latlng = new google.maps.LatLng(-34.397, 150.644); var myOptions = { zoom: 8, center: latlng, mapTypeId: google.maps.MapTypeId.ROADMAP }; var map = new google.maps.Map(document.getElementById("map_canvas"), myOptions); } </script> </head> <body onload="initialize()"> <div id="map_canvas" style="width:100%; height:100%"></div> </body> </html> </pre> </div> <p data-bbox="1213 1338 1377 1373" style="text-align: center;">Figure 10-1</p>

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	<p>See Ex. 780-H, “Google Maps API V3 Tutorial,” http://code.google.com/apis/maps/documentation/javascript/tutorial.html (last visited Aug 18, 2011). The above code embeds the results of the scripting language, outlined in red, into an HTML document, and produces a visible representation of a map of Sydney, Australia (viewable at http://code.google.com/apis/maps/documentation/javascript/examples/map-simple.html).</p> <p>Second, the Google Maps application also displays the visible effects of a markup language and the visible text of such a mark up language. Similar to the Javascript API V3, the Google Maps API Web Services is an example of how the Google Maps application functions on a mobile device. Importantly, Google’s technical documentation states:</p> <p style="padding-left: 40px;">“The Google Maps API provides these web services as an interface for requesting Maps API data from external services and using them within your Maps applications. These services are designed to be used in conjunction with a map, as per the Maps API Terms of Service License Restrictions. These web services use HTTP requests to specific URLs, passing URL parameters as arguments to the services. Generally, these services return data in the HTTP request as either JSON or XML for parsing and/or processing by your application.”</p> <p>See Ex.780-I, “Google Maps API Web Service,” http://code.google.com/apis/maps/documentation/webservices/#WebServices (last visited Aug. 18, 2011).</p> <p>JSON (JavaScript Object Notation) and XML (Extensible Markup Language) are markup languages used to transfer data between a server and a web application. The Maps API Web Services can use either language to transfer information, such as place page data, to an application. See Ex. 780-J, “The Google Places API,” http://code.google.com/apis/maps/documentation/places/#PlaceDetails (last visited Aug. 18, 2011). Upon sending a request for place details—the information that is used to populate a</p>

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	<p>place page—the Maps API Web Services will respond with information similar to the following:</p> <div data-bbox="743 380 1860 1218"> <div>JSON XML</div> <pre> <?xml version="1.0" encoding="UTF-8"?> <PlaceDetailsResponse> <status>OK</status> <result> <name>Google Sydney</name> <vicinity>Pirrama Road, Pyrmont</vicinity> <type>establishment</type> <formatted_phone_number>(02) 9374 4000</formatted_phone_number> <formatted_address>5/48 Pirrama Road, Pyrmont NSW, Australia</formatted_ad dress> . . . <rating>4.5</rating> <url>http://maps.google.com/maps/place?cid=10281119596374313554</url> <icon>http://maps.gstatic.com/mapfiles/place_api/icons/generic_business-71 .png</icon> <reference>CmRRAAAATp0heNdDJDp5cdz1EGLqIGWhdrUnsyvn5plkwb6IbydAdnExNaDAdXB xRjhaFINDJUlUvLkVUS2TFmUDsIDRrUCm-9Q7XLu6vi-bspAju4GG2XzRhv92By9yJbK2PJVOEhD 3QlprissY-rI0w3Ego93jGhSy7x8zDUYSrovufHl0xUGkcbjHBg</reference> <id>4f89212bf76dde31f092cfc14d7506555d85b5c7</id> </result> </PlaceDetailsResponse> </pre> </div> <p style="text-align: center;">Figure 10-2</p> <p>(abridged from original) See <i>Id.</i> at http://code.google.com/apis/maps/documentation/places/#PlaceDetailsResponses.</p>

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	<p>Note that Figure 10-2 shows only the XML data, for brevity's sake. However, the API may also return similar JSON data if the application is configured to receive that data instead. Figure 10-3 shows, for instance, how the Motorola Droid 2 renders the place details, shown in Figure 10-2, into a place page:</p>  <p style="text-align: center;">Figure 10-3</p> <p style="text-align: center;">See Appendix 10-3 for similar images of the other Accused Motorola Devices</p>

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	<p>Comparing Figures 10-2 and 10-3, notice that several text elements from the XML code are visually presented on the place page including the phone number (“<formatted_phone_number>”) and address (“<formatted_address>”) information. Furthermore, visible effects of the XML code are also displayed in the place page. For instance, Figure 10-2 describes the location as having a rating of 4.5 (see the “<rating>” tag). Figure 10-3 displays this rating as a graphical element—four and one-half gold stars. As such, Google Maps application displays content that is both visible effects of a markup language and visible text of such a markup language.</p>
<p>11. A hypermedia browser of claim 1, wherein content is data formatted for presentation which is selected from a group consisting of HTML, text, SGML, XML, java, XHTML, JavaScript, streaming video, VRML, Active X, Flash. scripting language for the world wide web.</p>	<p>The infringement chart for Claim 1 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes at least content that is data formatted for presentation which is selected from a group consisting of text, XML, and JavaScript.</p> <p>As described for Claim 1[b], and incorporated herein the Google Maps application includes content, including maps, points of interest, various layers, place pages and Wikipedia pages. Moreover, this content is from a source external to the application. As described in Claim 10 above, this various content is selected from a group comprising at least text, XML and JavaScript.</p>
<p>12[pre].An information processing device comprising:</p>	<p>Motorola directly and indirectly infringes this and the following “information processing device” claims in the same manner as described for Claim 1[a] above.</p> <p>To the extent the preamble is construed to be limiting, each Accused Motorola Device is an information processing device.</p> <p>For example, the Motorola Droid 2 is such an information processing device. According to the Droid 2 User Guide, this device is capable of processing multiple forms of information:</p>

'780 Patent	Exemplary Motorola Device
	<p>DROID2 by Motorola gives you a high quality imaging, video, and multimedia experience. Your new phone also syncs , feeds, messages, e-mails, photos, and much more—from sources like Facebook, Twitter, MySpace, Gmail, your email at work—and serves them all up just the way you want them.</p> <p>See Ex. 780-K, Droid2 User Guide pg. 1, http://www.motorola.com/staticfiles/Support/US-EN/Mobile%20Phones/DROID2/US-EN/Documents/Static_Files/DROID2_UG_US_ENG_VZW_68014406001a.pdf (last visited Aug. 18, 2011). Similar information may be found for each of the Accused Motorola Devices in Appendix 1-1.</p>
12[a]. a processor;	Each Accused Motorola Device includes a processor. For instance, the Motorola Droid 2 contains a 1 GHz TI OMAP3620-1000 processor. See Ex. 780-A. Similar information may be found for each of the Accused Motorola Devices in Appendix 1-1.
12[b]. a display;	Each Accused Motorola Device includes a display. For instance, the Motorola Droid 2 contains a 3.7 in. (measured diagonally) FWVGA (480 x 854) display. See Ex. 780-A. Similar information may be found for each of the Accused Motorola Devices in Appendix 1-1.
12[c]. a hypermedia browser executing on the processor to load and display content in a content viewing area on the display;	<p>Each Accused Motorola Device includes a hypermedia browser executing on the processor to load and display content in a content viewing area on the display. See evidence discussed above for Claim 1[a] and for Claim 1[b].</p> <p>Notice, the limitation from Claim 12[f], describing content as comprising data for presentation which is from a source external to the browser, uses the same language as the similar limitation disclosed in Claim 1[d].</p>
12[d]. wherein the hypermedia browser displays a temporary graphic element over the	Each Accused Motorola Device includes a hypermedia browser that displays a temporary graphic element over the content viewing area during times when the browser is loading visible content. See evidence discussed above for Claim 1[b] and Claim 2.

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content viewing area during times when the browser is loading visible content;	
12[e]. wherein the temporary graphic element is positioned only over a portion of the content viewing area and obstructs only part of the visible content in the content viewing area; and	Each Accused Motorola Device includes a temporary graphic element that is positioned only over a portion of the content viewing area and obstructs only part of the visible content in the content viewing area. See evidence discussed above for Claim 1[c].
12[f]. wherein the temporary graphic element indicates to a user that the browser is loading content and content comprises data for presentation which is from a source external to the browser.	Each Accused Motorola Device includes a temporary graphic element that disappears when the browser's loading of content is complete to indicate to a user that such loading of content is complete. See evidence discussed above for Claim 3.
13. An information processing device as recited in claim 12, wherein the temporary graphic element is animated.	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference. Each Accused Motorola Device includes a temporary graphic element that is animated. See evidence discussed above for Claim 5.
14. An information processing device as recited in claim 12, wherein the hypermedia browser displays the temporary graphic element in a corner of the content viewing area.	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference. Each Accused Motorola Device includes a hypermedia browser that displays the temporary graphic element in a corner of the content viewing area. See evidence discussed above for Claim 6.
17. A hypermedia browser of	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference.

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claim 12, wherein content is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language.	Each Accused Motorola Device includes content that is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language. See evidence discussed above for Claim 10.
18. A hypermedia browser of claim 12, wherein content is data formatted for presentation which is selected from a group consisting of HTML, text, SGML, XML, java, XHTML, JavaScript, streaming video, VRML, Active X, Flash. scripting language for the world wide web.	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference. Each Accused Motorola Device includes at least content that is data formatted for presentation which is selected from a group consisting of text, XML, and JavaScript. See evidence discussed above for Claim 11.
20. An information processing device as recited in claim 12, wherein the temporary graphic element is not content.	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference. Each Accused Motorola Device includes a temporary graphic element that is not content. See evidence discussed for Claim 1[d] above.
21. An information processing device as recited in claim 12, wherein the temporary graphic element disappears when the browser's loading	The infringement chart for Claim 12 of the ‘780 patent is incorporated herein by reference. Each Accused Motorola Device includes a temporary graphic clement that disappears when the browser's loading of content is complete to indicate to a user that such loading of content is complete. See evidence discussed for Claim 4 above.

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<p>of content is complete to indicate to a user that such loading of content is complete.</p>	
<p>32[pre].A method of indicating a content "load status" of a hypermedia browser having a content viewing area for viewing content, the method comprising:</p>	<p>Motorola directly infringes this and the following related method claims under 35 U.S.C. § 271 (b) at least by practicing each step of the claim in the United States when it uses the Accused Motorola Devices, each capable of performing a method that indicates a content "load status" (as explained below). For instance, Motorola practices the infringing method when testing its smartphones devices in the United States.</p> <p>Moreover, Motorola indirectly infringes this and the following related method claims under 35 U.S.C. § 271 (b) at least by actively inducing consumers of Motorola's smartphone devices to use such devices in a manner that practices every step of the claimed method in the United States. For instance, with each Accused Motorola Device, Motorola provides a User Guide or some similar instruction manual which instructs the consumer how to use the Google Maps application included on the device in a manner that infringes this claim. See, e.g., Ex. 780-K, Droid 2 User Guide pgs. 39-42. As such, the consumer of Motorola's products is the direct infringer of the method claims because they use the Google Maps application in a manner that practices every step of the claim. Motorola has known about the '780 patent at least since the filing date of Microsoft's Answer in the original matter (W.D. Wisc. No. 3:10-cv-699).</p> <p>Motorola contributorily infringes this and the following related method claims under 35 U.S.C. § 271 (c) by importing, selling, and/ or offering for sale, within the United States, the Accused Motorola Devices containing software for use in practicing the patented method claims as described and distinctly pointed out in these claim charts, such software constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of the '780 patent. The software is not a staple article or commodity of commerce suitable for substantial noninfringing use. For example, at least the software that displays loaded content within the content viewing area of a screen of a hypermedia browser, the screen being without a "load status" graphic element, wherein a "load status" graphic element indicates a current content load status of the hypermedia browser is especially made</p>

'780 Patent	Exemplary Motorola Device
	<p>for use in an infringement of the '780 patent.</p> <p>To the extent the preamble is construed to be limiting, each Accused Motorola Device is capable of indicating content "load status" of a hypermedia browser having a content viewing area for viewing content. See evidence discussed for Claim 1[a] and Claim 1[b] above.</p> <p>Notice, the limitation from Claim 32[d], describing content as comprising data for presentation which is from a source external to the browser, uses the same language as the similar limitation disclosed in Claim 1[d].</p>
<p>32[a]. displaying loaded content within the content viewing area of a screen of a hypermedia browser, the screen being without a "load status" graphic element, wherein a "load status" graphic element indicates a current content load status of the hypermedia browser;</p>	<p>Each Accused Motorola Device includes a hypermedia browser that displays a temporary graphic element over the content viewing area during times when the browser is loading visible content.</p> <p>As discussed for Claim 1[a] and Claim 1[b] above, the Google Maps application is a hypermedia browser. Similarly described for Claim 1[a] and 1[b], Google Maps displays loaded content, such as maps, points of interest, layers and place pages in the map viewing area. See, e.g., Figs. 1-5 and 1-6, <i>supra</i>. Furthermore, this content is displayed without the presence of any "load status" graphic element whatsoever. <i>See id.</i> There is no permanent "loading status" icon displayed on the Google Maps application.</p> <p>Similarly, the evidence discussed for Claim 2 is apposite to this claim and is incorporated herein. While content is being loaded in preparation for display as, for example, a place page or Wikipedia page, respectively, a small black rectangle, containing an animated circle and the word "Loading," appears over a portion of the map viewing area for a temporary period of time. See, e.g., Figures 2-1 and 2-2, <i>supra</i>. Because of these qualities, the black loading rectangle is a "load status" graphic element that indicates a load status of the Google Maps application.</p> <p>The black loading rectangle is displayed over a portion of the map viewing area only during the time when the application is loading content. When the application is finished loading the</p>

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	<p>place page or Wikipedia page information, the black loading rectangle disappears and the place page or Wikipedia page is displayed instead. See Figures 2-1 and 2-2, <i>supra</i>. Accordingly, the black loading rectangle “load status” graphic element that indicates a <i>current</i> content load status of the Google Maps application.</p> <p>Also, the place page and Wikipedia page are both content. See evidence discussed for Claim 2 above.</p>
32[b]. receiving an instruction to load new content into the content viewing area;	<p>Each Accused Motorola Device receives an instruction to load new content into the content viewing area.</p> <p>As described for Claim 1[a] above, a user may select certain labeled points of interest, such as an airport or a park, by tapping them on the map viewing area. Accordingly, the Google Maps application receives an instruction to load new content—i.e., the place page or Wikipedia page information corresponding to the airport or park. Moreover, the Google Maps application is directed to load the place page and Wikipedia page information into the content viewing area, completely replacing the map and layers information. See Figures 1-5 and 1-6, <i>supra</i>, for an illustration.</p>
32[c]. loading such new content into the content viewing area; and	<p>Each Accused Motorola Device loads such new content into the content viewing area.</p> <p>As described for Claim 32[b], the Google Maps application loads new content, like the place page or Wikipedia page, into the content viewing area.</p>
32[d]. while loading, displaying a “load status” graphic element over the content viewing area so that the graphic element obstructs only part of the content in such content viewing area; and	<p>Each Accused Motorola Device, conducting the loading step, displays a “load status” graphic element over the content viewing area so that the graphic element obstructs only part of the content in such content viewing area. See evidence discussed for Claim 1[c] above, wherein the black loading rectangle is a “load status” graphic element.</p>

'780 Patent	Exemplary Motorola Device
<p>wherein content comprises data for presentation which is from a source external to the browser.</p>	
<p>33. A method as recited in claim 32 further comprising, upon completion of the loading, removing the "load status" graphic element to reveal the part of the content in the content viewing area that the graphic element obstructed when the element was displayed.</p>	<p>The infringement chart for Claim 32 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device, upon completion of the loading, removes the "load status" graphic element to reveal the part of the content in the content viewing area that the graphic element obstructed when the element was displayed.</p> <p>If the Wikipedia layer content has not been previously loaded into the Google Maps application, a temporary graphic element will appear over the content viewing area during the times that the application is loading content. As describe above for Claim 1[b], the Google Maps application can add layers to the map viewing area that can provide information beyond the map's typical functions. For instance, one of those layers is the Wikipedia layer, described in Figure 1-6, <i>supra</i>. As shown, adding layers to the map requires the display of additional graphical elements. In the case of the Wikipedia layer, the additional graphical elements are the multiple "W" in white boxes overlaid on top multiple points of interest. The information respecting where these layers are placed on the map is content, and—like much of the information used by Google Maps—is received from a source external to the application.</p> <p>While these additional graphic elements are being loaded and displayed on the screen, an animated grey hashed circle appears in the top right corner of the map viewing area. See Figure 6, <i>supra</i>. The grey hashed circle appears only over a portion of the map viewing area and is only displayed during the temporary period of time that the Wikipedia layer information is being loaded on the map. Because of these qualities, the grey hashed circle is a "load status" graphic element that indicates a load status of the Google Maps application.</p> <p>The grey hashed circle is displayed only during the loading of the layer content. Upon completion of the loading of this content, the grey hashed circle—a "load status" graphic</p>

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	<p>element—is removed from the screen. See Fig. 6, <i>supra</i>.</p> <p>The grey hashed circle is positioned over the map viewing area. The grey hashed circle obstructs only a part of the visible content in the map viewing area. See Fig. 6, <i>supra</i>. That is, while the small portion of the map covered by the grey hashed circle is obscured from the user's view, the remaining portions of the map not covered by the grey hashed circle are still viewable to the user.</p> <p>Removing the grey hashed circle from the screen reveals the part of the content in the map viewing area that the grey hashed circle obstructed when it was displayed. See Fig. 6, <i>supra</i>.</p>
<p>34. A hypermedia browser of claim 32, wherein content is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language.</p>	<p>The infringement chart for Claim 32 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes content that is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language. See evidence discussed above for Claim 10.</p>
<p>35. A hypermedia browser of claim 32, wherein content is data formatted for presentation which is selected from a group consisting of HTML, text, SGML, XML, java, XHTML, JavaScript, streaming video, VRML, Active X, Flash. scripting</p>	<p>The infringement chart for Claim 32 of the '780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes at least content that is data formatted for presentation which is selected from a group consisting of text, XML, and JavaScript. See evidence discussed above for Claim 11.</p>

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language for the world wide web.	
36[pre]. A computer-readable medium having computer-executable instructions that, when executed by a computer, perform a method of indicating a content "load status" of a hypermedia browser having a content viewing area for viewing content, the method comprising:	<p>Motorola directly and indirectly infringes this and the following "computer-readable medium" claims in the same manner as described for Claim 1[a] above.</p> <p>To the extent the preamble is construed to be limiting, each Accused Motorola Device includes a computer-readable medium having computer-executable instructions that, when executed by a computer, perform a method of indicating a content "load status" of a hypermedia browser having a content viewing area for viewing content. See evidence discussed for Claim 1[a] and Claim 1[b] above.</p> <p>Notice, the limitation from Claim 32[d], describing content as comprising data for presentation which is from a source external to the browser, uses the same language as the similar limitation disclosed in Claim 36[d].</p>
36[a]. displaying loaded content within the content viewing area of a screen of a hypermedia browser, the screen is without a "load status" graphic element, wherein a "load status" graphic element indicates a current content load status of the hypermedia browser;	Each Accused Motorola Device displays loaded content within the content viewing area of a screen of a hypermedia browser, the screen is without a "load status" graphic element, wherein a "load status" graphic element indicates a current content load status of the hypermedia browser. See evidence discussed for Claim 32[a] above.
36[b]. receiving an instruction to load new content into the content viewing area;	Each Accused Motorola Device receives an instruction to load new content into the content viewing area. See evidence discussed for Claim 32[b] above.
36[c]. loading such new content into the content viewing area; and	Each Accused Motorola Device loads such new content into the content viewing area. See evidence discussed for Claim 32[c] above.
36[d]. while loading, displaying a	Each Accused Motorola Device, conducting the loading step, displays a "load status" graphic

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<p>"load status" graphic element over the content viewing area so that the graphic element obstructs only part of the content in such content viewing area; and</p> <p>wherein content comprises data for presentation which is from a source external to the browser.</p>	<p>element over the content viewing area so that the graphic element obstructs only part of the content in such content viewing area. See evidence discussed for Claim 1[c] above, wherein the black loading rectangle is a "load status" graphic element.</p>
<p>37. A hypermedia browser of claim 36, wherein content is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language.</p>	<p>The infringement chart for Claim 36 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes content that is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language. See evidence discussed above for Claim 10.</p>
<p>38. A hypermedia browser of claim 36, wherein content is data formatted for presentation which is selected from a group consisting of HTML, text, SGML, XML, java, XHTML, JavaScript, streaming video, VRML, Active X, Flash. scripting</p>	<p>The infringement chart for Claim 36 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes at least content that is data formatted for presentation which is selected from a group consisting of text, XML, and JavaScript. See evidence discussed above for Claim 11.</p>

‘780 Patent	Exemplary Motorola Device
language for the world wide web.	
39. A computer-readable medium as recited in claim 36 further having additional computer-executable instructions that perform a method comprising, upon completion of the loading, removing the "load status" graphic element to reveal the part of the content in the content viewing area that the graphic element obstructed when the element was displayed.	<p>The infringement chart for Claim 36 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device, upon completion of the loading, removes the "load status" graphic element to reveal the part of the content in the content viewing area that the graphic element obstructed when the element was displayed. See evidence discussed above for Claim 33.</p>
40[pre].An information processing device comprising:	<p>Motorola directly and indirectly infringes this and the following “information processing device” claims in the same manner as described for Claim 1[a] above.</p> <p>To the extent the preamble is construed to be limited, each Accused Motorola Device includes an information processing device. See evidence discussed above for Claim 12[pre].</p>
40[a]. a processor;	Each Accused Motorola Device includes a processor. See evidence discussed above for Claim 12[a].
40[b]. a display;	Each Accused Motorola Device includes a display. See evidence discussed above for Claim 12[b].
40[c]. a hypermedia browser executing on the processor to load and display content in a	Each Accused Motorola Device includes a hypermedia browser executing on the processor to load and display content in a content viewing area on the display. See evidence discussed above for Claim 1[a] and for Claim 1[b].

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content viewing area on the display;	Notice, the limitation from Claim 40[f], describing content as comprising data for presentation which is from a source external to the browser, uses the same language as the similar limitation disclosed in Claim 1[d].
40[d]. wherein the hypermedia browser is configured to operate in a content-loading mode and a content-loaded mode;	<p>Each Accused Motorola Device includes a hypermedia browser that is configured to operate in a content-loading mode and a content-loaded mode.</p> <p>As discussed for Claim 1[a] above, the Google Maps application is a hypermedia browser. Similarly described for Claim 1[b], Google Maps displays loaded content, such as maps, points of interest, layers and place pages in the map viewing area. See, e.g., Figs. 1-4 and 1-5, <i>supra</i>. Furthermore, this content is displayed without the presence of any “load status” graphic element whatsoever. <i>See id.</i> There is no permanent “loading status” icon or any other graphic element displayed on the Google Maps application to indicate that the application is loading data. Therefore, during the time that the content is already loaded into the viewing area, the Google Maps application is operating in a content-loaded mode.</p> <p>As discussed for Claim 1[b] above, if content has not been previously loaded into the Google Maps application, a “load status” or some other graphic element will appear over the content viewing area to indicate a current content load status of the Google Maps application. While content is being loaded in preparation for display, a small black rectangle, containing an animated circle and the word “Loading,” appears over a portion of the map viewing area for a temporary period of time. Because of these qualities, the black loading rectangle is a “load status” graphic element that indicates a load status of the Google Maps application. For example, Figures 2-1 and 2-2, <i>supra</i>, are illustrative. Therefore, during the time that the content is being loaded into the viewing area—while the black loading rectangle covers a portion of the screen—the Google Maps application is operating in a content-loading mode.</p>
40[e]. in the content-loaded mode, the hypermedia browser	Each Accused Motorola Device, while operating in the content-loaded mode, includes a hypermedia browser that displays loaded content in the content viewing area and no “load

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<p>displays loaded content in the content viewing area and no "load status" graphic element is displayed, wherein absence of such "load status" graphic element indicates that the browser is in the content-loaded mode;</p>	<p>status" graphic element is displayed, wherein absence of such "load status" graphic element indicates that the browser is in the content-loaded mode.</p> <p>As described for Claim 1[a] above, the Google Maps application is a hypermedia browser that displays loaded content in the content viewing area.</p> <p>As described for Claim 40[d] above, the black loading rectangle is a temporary “load status” graphic element that is displayed over a portion of the map viewing area only during the time when the application is loading content. Before the application begins loading content information, the black loading rectangle is not visible on the screen. Moreover, when the application is finished loading the content information, the black loading rectangle disappears and the content is displayed instead. See Figures 2-1 and 2-2, <i>supra</i>. As such, during the times when content is already loaded onto the content viewing area of the Google Maps application—i.e., during content-loaded mode—no “load status” graphic element is display.</p> <p>Also as described for Claim 40[d] above, the appearance of the black loading rectangle (including the animated circle and “Loading” text) indicates to a user that the application is loading content. Therefore, the subsequent absence of the black loading rectangle indicates to a user that content is loaded and that the application is in the content-loaded mode.</p>
<p>40[f]. in the content-loading mode, the hypermedia browser loads content, displays such content in the content viewing area as it loads, and displays a "load status" graphic element over the content view area obstructing part of the content displayed in the content viewing area, wherein presence of such</p>	<p>Each Accused Motorola Device, while operating in the content-loading mode, includes a hypermedia browser that loads content, displays such content in the content viewing area as it loads, and displays a "load status" graphic element over the content view area obstructing part of the content displayed in the content viewing area, wherein presence of such "load status" graphic element indicates that the browser is in the content-loading mode.</p> <p>As described for Claim 1[a] above, the Google Maps application is a hypermedia browser that loads content, displays such content in the content viewing area as it loads.</p> <p>As described for Claim 40[d] above, while the Google Maps application is loading data, it displays the black loading rectangle—a “load status” graphic element—over the map viewing</p>

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<p>"load status" graphic element indicates that the browser is in the content-loading mode; and</p> <p>wherein content comprises data for presentation which is from a source external to the browser.</p>	<p>area. The black rectangle obstructs only a part of the visible content in the map viewing area. See Figs. 1-10, 1-11, <i>supra</i>. That is, while the small portion of the map covered by the black loading rectangle is obscured from the user's view, the remaining portions of the map not covered by the black loading rectangle are still viewable to the user.</p> <p>Moreover, as described for Claim 40[d], the Google Maps application renders and displays the black loading rectangle during the loading of content. The black loading rectangle contains further graphic elements viewable to a user including an animated circle and the word "Loading." These graphic elements, particularly the text "Loading," indicate to a user that the application is loading content. See, e.g., Figures 1-10, 1-11, <i>supra</i>. Therefore, the presence of the black loading rectangle—a "load status" graphic element—indicates that the Google Maps application is in the content-loading mode.</p>
<p>41. A hypermedia browser of claim 40, wherein content is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language.</p>	<p>The infringement chart for Claim 40 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes content that is data formatted for presentation which is selected from a group consisting of visible effects of a markup language, visible text of such a markup language, and visible results of a scripting language. See evidence discussed above for Claim 10.</p>
<p>42. A hypermedia browser of claim 40, wherein content is data formatted for presentation which is selected from a group consisting of HTML, text, SGML, XML, java, XHTML, JavaScript,</p>	<p>The infringement chart for Claim 40 of the ‘780 patent is incorporated herein by reference.</p> <p>Each Accused Motorola Device includes at least content that is data formatted for presentation which is selected from a group consisting of text, XML, and JavaScript. See evidence discussed above for Claim 11.</p>

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streaming video, VRML, Active X, Flash. scripting language for the world wide web.	